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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ANTHONY L. BLANFORD and JOHN K.
BELLVILLE,

Plaintiffs,

v.

MICHAEL J. DUNLEAVY; in his
individual and official capacities;
TUCKERMAN BABCOCK; and the
STATE OF ALASKA,

Defendants.

Case No. 3:19-cv-00036-JWS

**DECLARATION OF
TUCKERMAN BABCOCK**

I, Tuckerman Babcock, declare as follows:

1. After the election of Michael Dunleavy as governor in November 2018, I served as chair of his transition team. After his inauguration on December 3, 2018, I served as the Governor's Chief of Staff.

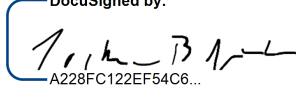
2. One of the many tasks of the Governor between the election and the inauguration was to staff the executive branch departments. In this effort, on November 16, 2018, I sent a memorandum to the State's at-will employees. The memo instructed recipients to submit written resignations by November 30, 2018. Employees who wished to remain in their positions were to make their resignations effective "upon acceptance by the Dunleavy administration" and to state an interest in continuing state

employment. Accompanying the memorandum was a simple template for the resignation and statement of interest.

3. Statewide, most employees submitted letters of resignation with statements of interest. These employee letters were not disseminated or made publicly available. Dr. Blanford and Dr. Bellville were two of the few employees who failed to respond to the administration's request. Because they failed to respond to the memorandum, Dr. Blanford and Dr. Bellville were notified of the termination of their at-will employment on December 3, 2018. Other employees who failed to respond to the resignation request were also terminated. Their failure to submit a resignation was the reason for their discharge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED: April 9, 2021.

DocuSigned by:

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By _____
Tuckerman Babcock

I certify that on April 9, 2021, a copy of the foregoing was served electronically on:

Stephen Koteff, skoteff@acluak.org
Joshua Decker, jdecker@acluak.org

s/Michael B. Baylous